

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	
)	Criminal No. 15-CR-300 <u>36</u> MGM
v.)	
)	21 U.S.C. § 841 (Distribution and Possession
BIENVENIDO NUÑEZ,)	with Intent to Distribute Cocaine)
a/k/a Apache,)	(Count One)
)	
Defendant.)	21 U.S.C. § 853
)	(Forfeiture Allegation)
)	

INDICTMENT

The Grand Jury charges that:

COUNT ONE: Title 21, United States Code, Section 841: Distribution and Possession
with Intent to Distribute Cocaine

1. On or about August 4, 2015, in Hampden County, in the District of
Massachusetts,

BIENVENIDO NUÑEZ,
a/k/a Apache,

the defendant herein, did knowingly and intentionally distribute and possess with intent to
distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II
controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

FORFEITURE ALLEGATION
(Title 21, United States Code, Section 853)

The Grand Jury further charges that:

1. Upon conviction of the offense alleged in Count One of this Indictment,

BIENVENIDO NUÑEZ,
a/k/a Apache,

defendant herein, shall forfeit to the United States, any property constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as a result of such offense; and/or any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense.

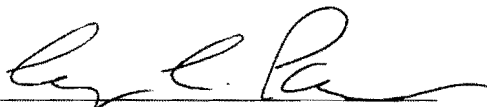
2. If any of the property described in paragraph 1, above, as a result of any act or omission of the defendant,

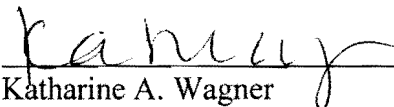
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in paragraph 1 above.

All pursuant to Title 21, United States Code, Section 853.

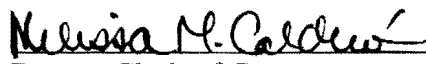
A TRUE BILL


Foreperson of the Grand Jury


Katharine A. Wagner
Assistant United States Attorney

DISTRICT OF MASSACHUSETTS:

Returned into the District Court by the Grand Jurors and filed on
October 22, 2015.


Deputy Clerk of Court